

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Francis P. O’Keeffe	:	Chapter 13
		:	
	Debtor	:	
<hr/>		:	
Toyota Motor Credit Corporation		:	
Movant		:	Bankruptcy Case Number
		:	17-16941 ELF
		:	
v.		:	
		:	
Francis P. O’Keeffe		:	
		:	
Respondent/Debtor		:	
		:	
And		:	
		:	
William C. Miller, Esquire		:	
Trustee		:	

**Debtor's Response to the Motion of Toyota Motor Credit Corporation
for Relief from the Automatic Stay**

Debtor, **Francis P. O’Keeffe**, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of Toyota Motor Credit Corporation and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. DENIED. Answering Debtor denies the allegations contained in this paragraph as

conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor avers that he is current with his payments.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor avers that he is current with his payments.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. ADMITTED.

WHEREFORE, Debtor, Francis P. O’Keeffe, requests this Honorable Court deny the motion of Toyota Motor Credit for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor